

Ms. Dawn Golden, Controller
The Kay Company, Incorporated
509 West Barner Street
P.O. Box 429
Frankfort, Indiana 46041

Re: **023-11004**
First Significant Permit Modification to
Part 70 No.: T 023-5664-00021

Dear Ms. Golden:

The Kay Company, Inc., was issued a permit on December 19, 1998, for a stationary hardboard and particle board part fabrication operation. A letter requesting changes to this permit was received on May 27, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The permit modification consists of a relaxation of monitoring requirements, and removal of a testing requirement regarding the surface coating operation.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Melissa Groch, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Melissa Groch or extension 3-8397, or dial (317) 233-8397.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

MMG

cc:File - Clinton County

U.S. EPA, Region V

Clinton County Health Department

Air Compliance Section Inspector - Eric Courtright

Compliance Data Section - Melinda Jones

Administrative and Development - Janet Mobley

Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**The Kay Company, Inc.
509 West Barner Street
Frankfort, IN 46041**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T023-5664-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 19, 1999
First Administrative Amendment: AA023-10758	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 28, 1999
First Significant Permit Modification: 023-11004	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Three (3) Paint Booths

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Usage Limit
- D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-6]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-7-6(1), (6)]
- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Particulate Matter (PM)
- D.1.10 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS- Woodworking

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.4 Particulate Matter (PM)

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary hardboard and particle board part fabrication operation.

Responsible Official: Michael S. Kay
Source Address: 509 West Barner Street, Frankfort, Indiana 46041
Mailing Address: P.O. Box 429, Frankfort, Indiana 46041
SIC Code: 2499, 3993, 2541
County Location: Clinton County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) roll coaters, identified as EU-1 and EU-2 and one (1) spray coater, identified as EU-3:
 - (a) roll coater EU-1, with a maximum application capacity of six (6) gallons per hour of coating, exhausting to four (4) stack vents identified as S/V 1, 2, 5, and 7, consists of:
 - (1) six (6) roll coating applicators,
 - (2) oven CE#1,
 - (3) a slave oven, and
 - (4) oven CE#2 with a direct flame.
 - (b) roll coater EU-2, with a maximum application capacity of 0.76 gallons per hour of coating, exhausts to three (3) stack vents identified as S/V 4, 6, and 8, and consists of:
 - (1) one (1) roll coating applicator and
 - (2) one oven with a direct flame.
 - (c) spray booth EU-3, with a maximum application capacity of one and one half (1.5) gallons per hour of coating, is controlled by a dry filter wall, identified as CE#3, exhausting to one (1) stack vent, identified as S/V 3.
- (2) Woodworking controlled by ten (10) dust collectors identified as DC-1 thru DC-10 exhausting indoors year round.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Two (2) roll coaters, identified as EU-1 and EU-2 and one (1) spray coater, identified as EU-3:

- (a) roll coater EU-1, with a maximum application capacity of six (6) gallons per hour of coating, exhausting to four (4) stack vents identified as S/V 1,2, 5, and 7, consists of:
 - (1) six (6) roll coating applicators,
 - (2) oven CE#1,
 - (3) a slave oven, and
 - (4) oven CE#2 with a direct flame.
- (b) roll coater EU-2, with a maximum application capacity of 0.76 gallons per hour of coating, exhausts to three (3) stack vents identified as S/V 4, 6, and 8, and consists of:
 - (1) one (1) roll coating applicator and
 - (2) one oven with a direct flame.
- (c) spray booth EU-3, with a maximum application capacity of one and one half (1.5) gallons per hour of coating, is controlled by a dry filter wall, identified as CE#3, exhausting to one (1) stack vent, identified as S/V 3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Usage Limit

Pursuant to 40 CFR 63.801(a) Incidental wood furniture manufacturer, this major source, for HAPs, is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and shall use no more than 100 gallons per month of finishing material or adhesives when surface coating wood furniture or wood furniture components in EU 1 through 3. Therefore, the requirements of 40 CFR 63, Subpart JJ shall not apply.

D.1.2. Volatile Organic Compound (VOC) [326 IAC 8-6]

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 99 tons per 12 consecutive month period, for two (2) emission units, identified as EU1 and 2. This is equivalent to the potential to emit of VOC of 99 tons per year for EU 1 and EU 2. Therefore, the requirements of 326 IAC 8-6 shall not apply.

D.1.3. Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from each of the surface coaters shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the emission unit, identified as EU-3, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test EU 3 by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.
- (b) Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The dry filter wall for PM control shall be in operation at all times when the paint booth (EU-03) is in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed of EU-3 to verify the placement, integrity and particle loading of dry filter wall. To monitor the performance of the dry filter wall, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections EU-1 through EU-3 shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with D.1.1, the Permittee shall maintain purchase or usage records demonstrating that the source meets criteria specified in 40 CFR 63.800(a) Subpart JJ. Records shall be taken quarterly, and the average monthly usage calculated, and shall be complete and sufficient to establish compliance with the usage limits established in Condition D.1.1.
- (b) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	The Kay Company, Inc.
Source Location:	509 West Barner Street, Frankfort, Indiana 46041
County:	Clinton
SIC Code:	2499, 3993, 2541
Operation Permit No.:	T023-5664-00021
Operation Permit Issuance Date:	December 19, 1998
Source Modification No.:	023-11004-00021
Permit Reviewer:	Melissa Groch

On August 11, 1999 the Office of Air Management (OAM) had a notice published in the Times Inc., Frankfort, Indiana, stating that The Kay Company, Inc., had applied for a Significant Permit Modification to their Part 70 Operating Permit for the operation of a hardboard and particle board part fabrication plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has incorporated the following changes into the final Part 70 permit (changes are **bolded** for emphasis, and previous language changed or deleted has a ~~strikeout line~~ through it).

1. The title page of the Part 70 permit has a rule cite listed that is no longer necessary in the second paragraph. This paragraph now reads as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. On the replacement pages 5 and 29 for the Part 70 permit, the description for the roll coating applicators associated with EU-1 mistakenly contained the wrong number of roll coating applicators which had previously been amended to six, pursuant to the First Administrative Amendment, 023-5664, issued April 28, 1999. The description under condition A.2, Emission Units and Pollution Control Equipment Summary, part (1)(a)(1), and its corresponding description in the Section D.1 facility description box should continue to read as follows:

- (1) ~~three (3)~~ **six (6)** roll coating applicators,

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Significant Permit Modification
to a Part 70 Operating Permit**

Source Background and Description

Source Name:	The Kay Company, Inc.
Source Location:	509 West Barner Street, Frankfort, Indiana 46041
County:	Clinton
SIC Code:	2499, 3993, 2541
Operation Permit No.:	T023-5664-00021
Operation Permit Issuance Date:	December 19, 1998
Source Modification No.:	023-11004-00021
Permit Reviewer:	Melissa Groch

The Office of Air Management (OAM) has reviewed a permit modification application from The Kay Company, Inc., relating to the operation of hardboard and particle board part fabrication.

History

On May 27, 1999, The Kay Company, Inc., submitted an application to the OAM requesting to remove the testing condition for the surface coating operation roll coaters, EU1 and EU2. The Kay Company, Inc., was issued a Part 70 permit on December 19, 1998.

Existing Approvals

The source was issued a Part 70 Operating Permit T023-5664-00021 on December 19, 1998. The source has since applied only for one permit modification, 123-11004.

The source has been operating under previous approvals including, but not limited to, the following:

OP-12-11-93-0140, issued on December 1, 1993.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 27, 1999. This application was determined to be incomplete. Additional information completing this application was received on July 2, 1999.

This modification will be considered a significant permit modification because pursuant to 326 IAC 2-7-12(d) it is a modification that significantly changes a monitoring requirement by removing a testing condition related to the limit established by the Part 70 operating permit so the source may not be subject to the requirements of 326 IAC 8-6.

Emission Calculations

Calculations submitted by the applicant regarding their most recent coatings and usage have been determined to be sufficient for this review.

Limited Potential to Emit

The table below summarizes the source potential to emit of the emission units affected by this permit modification.

Process / Facility	Limited Potential to Emit (tons/year)
	VOC
Roll Coating, EU1 and EU2	shall not exceed 99 tons per year
Total Emissions	less than 99

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clinton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability- Roll Coating Operation, EU1 and EU2

There are no New Source Performance Standards (326 IAC 12) applicable to the roll coating operation.

The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ) for only part of its operation because most of the wood products are not considered furniture by Subpart JJ definitions. The wood coating that is subject to Subpart JJ makes parts for cabinets or other furniture and meets the definition of incidental wood furniture. Since the applicable functions are few, they meet the definition of incidental wood furniture manufacturer under 40 CFR 63.801. Therefore they are limited to a usage of 100 gallons per month of finishing material or adhesives, and need only keep records of purchase or usage under 40 CFR 63.800(a), Subpart JJ.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Minor Limit)

This source is a minor source because, the total source potential emissions of volatile organic compound are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1

of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Roll Coating Operation, EU1 and EU2

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the PM emissions from the roll coaters, EU1 and EU2, shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 8-6 (Volatile Organic Compound)

326 IAC 8-6 applies to emission units EU1 and EU2 because these roll coaters were installed between 1974 and 1980, have the potential to emit 100 tons per year or more of VOC, and are not limited by any other article 8 rule.

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 99 tons per 12 consecutive month period, for two (2) emission units, identified as EU1 and EU2. This is equivalent to the potential to emit of VOC of 99 tons per year for EU1 and EU2. Therefore, the requirements of 326 IAC 8-6 shall not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to these emission units are as follows:

1. The roll coaters, EU1 and EU2, have applicable compliance monitoring conditions as specified below:

Monthly inspections shall be performed of the coating emissions from EU1 and EU2 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the roll coating operation, EU1 and EU2, must operate properly to ensure compliance with 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of the roll coating operation shall be subject to the conditions of the attached proposed **Significant Permit Modification No. 023-11004-00021**.

As a result of this permit modification, the following changes have been made to the Part 70 operating permit (strikeout indicates deleted language, and new language is bolded);

- (1) The title page of the Part 70 permit has a third box added to identify the permit modification. It appears as follows:

First Significant Permit Modification: 123-11004	Pages Affected: 3, 5, 29, 30, 31 and 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (2) In Section A, Condition A.2, Emission Units and Pollution Control Equipment Summary, part (1)(a)(4) and (1)(b)(2) both are changed to read:

(4) oven CE#2 with a direct flame ~~that acts as control~~.

and;

(2) one oven with a direct flame ~~that acts as control~~.

These description changes also appear in the corresponding D Section description box for these units.

- (3) Since the source has opted to rely only on low VOC coatings and usage to show they are not subject to the provisions of 326 IAC 8-6, the first sentence of Condition D.1.2, Volatile Organic Compound, has been modified to read as:

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 99 tons per 12 consecutive month period, for two (2) emission units, identified as EU1 and 2 ~~(the VOC input will be determined after the effect of the integral ovens).~~

- (4) Because the source has chosen to show compliance with 326 IAC 8-6 through VOC usage only, the testing requirement, part (b) of Condition D.1.6 for roll coaters EU1 and EU2, has been removed from the Title V permit. It previously read as follows:

~~(b) Testing is required for roll coaters EU 1 and EU 2. Compliance with the volatile organic compound limit specified in Condition D.1.2 (99 tons per year or 22.6 pounds per hour after the integral oven for both EU 1 and EU 2) shall be determined within 180 days after the effective date of this permit. The Permittee shall perform VOC testing on roll coaters EU 1 and EU2 to determine the amount of VOC emissions and the overall control efficiency of the control equipment, utilizing Method 24 and 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be considered a performance test to establish the ability of the ovens to control VOC emissions.~~

- (5) Also, Condition D.1.9, Volatile Organic Compound, has been deleted entirely because the source is now opting to rely on the use of low VOC coatings without the use of VOC destruction to comply with their limit. It read as:

~~The two (2) direct flame ovens for rollcoating lines EU1 and EU2 shall be in operation at all times to ensure compliance with Condition D.1.2. When operating, the incinerator shall maintain a minimum operating temperature, fan amperage, and duct velocity determined in the compliance test.~~

As a result of this condition being deleted, all subsequent conditions in Section D.1 have been renumbered accordingly. Also, the Table of Contents has been changed to reflect this deletion.

- (6) Because the ovens are now not considered an integral part of the roll coating process, part (c) in Condition D.1.11, now D.1.10, Monitoring, has been deleted. It read as follows:

~~(e) The temperature of the ovens and fan amperage shall be monitored once per shift.~~

- (7) As a result of several deletions noted above, Condition D.1.12, now D.1.11, Record Keeping Requirements, part (c) has been changed, part (d) has been deleted, and part (e) is now (d), as shown below:

(c) To document compliance with Conditions D.1.40 ~~9~~ and D.1.44 ~~10~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(d) To document compliance with Condition D.1.9 and D.1.11 the Permittee shall maintain a log of operating temperatures and fan amperage.~~

~~(e)~~ All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.